

BOARD OF SUPERVISORS



1055 MONTEREY, ROOM D430 • SAN LUIS OBISPO, CALIFORNIA 93408-1003 • 805.781.5450

June 2, 2015

Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Post Office Box 100
Sacramento, California 95814

FRANK R. MECHAM, Supervisor District One
BRUCE GIBSON, Supervisor District Two
ADAM HILL, Supervisor District Three
LYNN COMPTON, Supervisor District Four
DEBBIE ARNOLD, Supervisor District Five

RE: Grazing Regulatory Action Project (GRAP)

Dear Ms. Marcus and Members of the Board:

On behalf of the San Luis Obispo County Board of Supervisors, I want to thank you for the opportunity to comment on the Grazing Regulatory Action Project (GRAP) which is currently being evaluated by the State Water Resources Control Board (SWRCB). I am providing this letter to express the concerns by our Board and our local farming and ranching community.

San Luis Obispo County is a rural community with an economy and a culture heavily based in agriculture. As such, there exists over 1,000,000 acres of rangeland accounting for 47% of the landmass in the county. This land supports a cattle industry which was valued at over \$129,000,000 in 2014. Our ranching community has proactively taken steps since 1997 to develop ranch water quality management plans and implement best management practices to protect and enhance water quality. These water quality plans and best management practices follow the 1995 California Rangeland Water Quality Management Plan adopted by the State Water Resource Control Board. Additionally, ranch managers have engaged in water quality short courses developed and facilitated by the University of California Cooperative Extension (UCCE), the Natural Resource Conservation Service and many Resource Conservation Districts, specific to water quality management on rangeland.

While the San Luis Obispo County Board of Supervisors and our ranching community have great interest in maintaining and improving water quality, we are extremely concerned over the consideration of a statewide grazing regulatory program. The lack of consideration the SWRCB has given to many key physical, economic and regulatory factors are cause for great concern. Therefore, given the current approach by the SWRCB, we are not supportive of the GRAP and strongly suggest that the following specific points be addressed prior to developing a statewide regulatory program:

- It is imperative that the SWRCB identify clear objectives and reasonable outcomes prior to moving forward with the GRAP. To date, the information offered by the SWRCB lacks content outlining specific objectives and intended results and provides little foundation or need for a statewide grazing regulatory program.
- Since 1995, UCCE has collaborated on more than 30 research projects evaluating microbial water quality across rangeland ecosystems. The Information Center found at <http://rangelandwatersheds.ucdavis.edu/MWQIC/> synthesizes this work and ongoing research on California's rangeland watersheds to provide relevant and best available science for researchers, managers, and policy makers. We urge your Board to review and consider past and current research when considering the need for a statewide grazing regulation.

- Because there has been no clear, scientific evidence identifying livestock grazing as the sole cause of impairment to adjacent water bodies, the SWRCB must assess all impacts on water quality, including wildlife. This will ensure that the project's necessity is adequately evaluated and that the intended results, which remain to be defined, are achievable. Additionally, this will prevent any undue burden from being placed on the ranching community.
- Significant, voluntary efforts by the cattlemen's organizations from Santa Cruz, San Benito, Monterey, San Luis Obispo, Santa Barbara and Ventura Counties has resulted in a document titled, The CENTRAL COAST CATTLEMEN'S GRAZING LANDS NON-POINT SOURCE APPROACH showing how they protect and enhance water quality on rangeland along the Central Coast. These efforts include the development of voluntary ranch management plans, implemented best management practices and educational workshops facilitated by the UCCE. The SWRCB must consider these efforts and the benefits that they provide in order to assess whether a statewide regulatory approach is necessary and if a new regulatory framework is a viable mechanism for improving water quality on rangeland.
- A sufficient regulatory framework is currently available to the SWRCB to address water impairments on rangeland under the authority of the Clean Water Act and the Porter-Cologne Water Quality Act which adequately addresses water quality and non-point discharges of waste. Therefore, the addition of a new regulation is redundant and unnecessary.
- To date, a clearly defined mechanism to fund a statewide grazing regulatory program has not been identified. In order to establish an open process, it is incumbent upon the SWRCB to identify and disclose the funding structure intended to implement and maintain any regulatory structure. Additionally, it is important for the SWRCB to seriously consider the financial impact this program could have on cattle operations should fees be imposed. In all cases, additional fees would have an impact on cattle operations and, in some cases, additional fees may render operations financially unsustainable.
- In addition to considering the financial impacts to individual cattle operations, the SWRCB must thoroughly explore the overall economic impact this program could have on the economies of the state and counties. The cattle industry provides many direct and indirect economic benefits throughout California and these benefits could deteriorate if this program were to reduce the economic vitality of ranching in California.

Again, I thank you for this opportunity to comment and urge you to direct your staff to consider the points made by this Board and comments received by all stakeholders when evaluating the necessity of this potential statewide regulation. With the current information provided by the SWRCB and the lack of substantive justification, the San Luis Obispo County Board of Supervisors is not supportive of the GRAP.

Sincerely,

Debbie Arnold
Chairperson
San Luis Obispo County Board of Supervisors

cc: Board of Supervisors, San Luis Obispo County
Dan Buckshi, County Administrative Officer
Martin Settevendemie, Agricultural Commissioner/Sealer
Bill Monning, State Senator, 17th Senate district
Katcho Achadjian, State Assemblyman, 35th Assembly District